



James H. Goldin
T 803.255.9243
jamey.goldin@nelsonmullins.com

NELSON MULLINS RILEY & SCARBOROUGH LLP
ATTORNEYS AND COUNSELORS AT LAW

1320 Main Street | 17th Floor
Columbia, SC 29201
T 803.799.2000 F 803.256.7500
nelsonmullins.com

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Via Electronic Filing

Hon. Jocelyn Boyd
The Public Service Commission of South Carolina
101 Executive Drive, Suite 100
Columbia, SC 29210

Re: South Carolina Energy Freedom Act (H. 3659) Proceeding to Establish Duke Energy Carolinas, LLC's and Duke Energy Progress, LLC's Standard Offer, Avoided Cost Methodologies, Form Contract Power Purchase Agreements, Commitment to Sell Forms, and Any Other Terms or Conditions Necessary (Includes Small Power Producers as Defined in 16 United States Code 796, as Amended)-S.C. Code Ann. § 58-41-20(A) in Docket Nos. 2019-185-E and 2019-186-E.

Dear Ms. Boyd:

Attached for filing in the above-referenced dockets is the Joint Partial Proposed Order on Reconsideration of Johnson Development Associates, Incorporated ("JDA") and the South Carolina Solar Business Alliance, Incorporated ("SCSBA", and together with JDA, "Industry Intervenors"). This Joint Partial Proposed Order addresses the following issues determined in the Commission's January 30, 2020 Directive: pricing period for avoided energy rates, transparency of large QF avoided cost rates, other issues related to Duke's avoided cost calculations, reconsideration or limited rehearing on longer term fixed price PPA proposals, ratepayer risk, risk of long-term PURPA PPAs, ratepayer risk from utility-developed generation, and the request for clarification regarding Duke integration study.

Industry Intervenors Joint Partial Proposed Order does not address the issue of the Commission's consideration of its independent, qualified expert's report, as Industry Intervenors concur in the partial proposed order filed by South Carolina Coastal Conservation League and the Southern Alliance for Clean Energy.

Very truly yours,

/s/ James H. Goldin
James H. Goldin
Counsel for Johnson Development Associates, Inc.